

Brian R. Booker (SBN: 015637)
Annelise M. Dominguez (SBN: 033299)
GORDON REES SCULLY MANSUKHANI, LLP
111 W. Monroe Street, Suite 1600
Phoenix, AZ 85003
Telephone: (602) 794-2490
Facsimile: (602) 265-4716
bbooker@grsm.com
adominguez@grsm.com

*Attorneys for Defendant
Collection Bureau of America, Ltd.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

| | | |
|-------------------------------------|---|--------------------------------------|
| Danielle Jordan |) | CASE NO. 2:17-cv-01662-DLR |
| |) | |
| Plaintiff, |) | |
| |) | DEFENDANT COLLECTION BUREAU |
| vs. |) | OF AMERICA, LTD.'S MOTION FOR |
| |) | SUMMARY DISPOSITION OF |
| Collection Bureau of America, Ltd., |) | MOTION FOR SUMMARY |
| |) | JUDGMENT |
| Defendant. |) | |
| |) | |

Defendant Collection Bureau of America, Ltd. ("CBA") hereby requests this Court summarily grant its Motion for Summary Judgment, which was filed on March 29, 2018, ECF No. 26, against Plaintiff Danielle Jordan ("Plaintiff"), for Plaintiff's failure to oppose the well stated Motion. Fed. R. Civ. P. 56(e)(3).

Plaintiff was required to file a response within thirty (30) days of service of CBA's Motion for Summary Judgment, which would have been no later than April 30, 2018. LRCiv 56.1(d). As of the filing of this Motion for Summary Disposition, Plaintiff has not filed a response, has not requested an extension of time to file a response, and has otherwise failed to oppose the Motion for Summary Judgment. In fact, Plaintiff has not filed anything with the Court nor participated in this action since this Court granted former counsel for Plaintiff's Motion for Leave to Withdraw as Plaintiff's Counsel on September 19, 2017. Mot. for Leave, ECF No. 21.

1 Summary judgment is appropriate where there is no genuine dispute as to any
2 material fact. Fed. R. Civ. P. 56(a). Plaintiff did not address or dispute the facts in CBA's
3 Motion for Summary Judgment within the time required by the Federal Rules of Civil
4 Procedure and the Local Rules of Civil Procedure. This Court should therefore consider
5 the facts in the Motion for Summary Judgment undisputed for purposes of the Motion.
6 Fed. R. Civ. P. 56(e)(2). As a result, there is no genuine dispute as to any material fact,
7 CBA is entitled to judgment as a matter of law, and this Court may summarily grant the
8 Motion for Summary Judgment. Fed. R. Civ. P. 56(e)(3).

9 Accordingly, Collection Bureau of America, Ltd. respectfully requests that this
10 Court grant its Motion for Summary Judgment and enter an order dismissing Plaintiff
11 Danielle Jordan's claims with prejudice and awarding CBA its reasonable costs and
12 attorneys' fees in defending against Plaintiff's claims pursuant to A.R.S. § 12-349.

13 Dated this 7th day of May 2018.

14 GORDON REES SCULLY
15 MANSUKHANI, LLP

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17 By: /s/ Annelise M. Dominguez

18 Brian R. Booker
19 Annelise M. Dominguez

20 *Attorneys for Defendant*
21 *Collection Bureau of America, Ltd.*
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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Of Counsel to
Credit Repair Lawyers of America
22142 West Nine Mile Road
Southfield, MI 48033

Attorneys for Plaintiff Danielle Jordan

/s/ Angelina Chavez